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7 8	Attorneys for Defendant, HUSSMANN CORPORATION	
9	UNITED STATES	DISTRICT COURT
10		OF NEVADA
11	TRAVELERS PROPERTY CASUALTY	CASE NO: 3:15-cv-00351-HDM-VPC
12	COMPANY OF AMERICA, a Connecticut	CASE NO. 3.13-64-00331-11DM-41 C
13	Corporation as Subrogee of PACIFIC CHEESE CO., INC. and LAKE VALLEY PROPERTIES, LLC,	
14	Plaintiffs,	JOINT MOTION TO EXTEND TIME FOR FILING JOINT PRE-TRIAL
15	v.	ORDER
16	ADVANCED COIL TECHNOLOGY, LLC a	
17	Minnesota limited liability company; PHOENIX HOLDINGS OF OWATONNA, INC., a Minnesota corporation; HUSSMANN	
18 19	CORPORATION, a Missouri corporation, individually and as successor in interest to Krack	
20	Corporation; BRIGGS ELECTRIC, INC., a California Corporation; RAY HEATING	
21	PRODUCTS, INC. dba RHP MECHANICAL SYSTEMS, a Nevada Corporation,	
22	Defendants.	
23		
24	HUSSMANN CORPORATION, a Missouri corporation,	
25	Cross-Claimant,	
26	v.	
27 28	ADVANCED COIL TECHNOLOGY, LLC, a Minnesota limited liability company; PHOENIX HOLDINGS OF OWATONNA, INC., a Minnesota	

1 2 3	corporation; BRIGGS ELECTRIC, INC., a California Corporation; RAY HEATING PRODUCTS, INC. dba RHP MECHANICAL SYSTEMS, a Nevada Corporation, and ZOES 1- 20, inclusive, Cross-Defendants.	
5	BRIGGS ELECTRIC, INC.,	
6	Cross-Claimant,	
7	v.	
8	ADVANCED COIL TECHNOLOGY, LLC, a	
9	Minnesota limited liability company; PHOENIX HOLDINGS OF OWATONNA, INC., a Minnesota	
10	corporation; HUSSMAN CORPORATION, a Missouri corporation, individually and as successor in	
11	interest to Krack Corporation; and RAY HEATING PRODUCTS, INC. dba RHP MECHANICAL	
12	SYSTEMS, a Nevada Corporation, Cross-Defendants.	
13	Cross-Defendants.	
14	DAY HEATING PRODUCTS INC. 41- DUR	
15	RAY HEATING PRODUCTS, INC. dba RHP MECHANICAL SYSTEMS,	
16	Cross-Claimant,	
17	v.	
18	ADVANCED COIL TECHNOLOGY, LLC, a	
19	Minnesota limited liability company; PHOENIX HOLDINGS OF OWATONNA, INC., a Minnesota	
20	corporation; HUSSMAN CORPORATION, a Missouri corporation, individually and as successor in interest to Krack Corporation; BRIGGS ELECTRIC,	
21	INC., a California Corporation,	
22	Cross-Defendants.	
23	COMES NOW, Plaintiff, TRAVELERS PROPERTY CASUALTY COMPANY OF	
24	AMERICA and LAKE VALLEY PROPERTIES, LLC, Defendant, RAY HEATING PRODUCTS,	
25		
26	INC. dba RHP MECHANICAL SYSTEMS and Defendant, HUSSMAN CORPORATION, by and through their undersigned counsel, and hereby submits this Joint Motion to Extend Time for Filing	
27	Joint Pre-Trial Order. This Motion is based upon the following:	
28	That Order. This wonder is based upon the following.	

-2-

1	1. Present Due Date for the Proposed Joint Pre-Trial Order is September 28, 2018.	
2	2. Due to the sheer volume of documents and depositions in the case, the exhibits list will be	
3	substantial, requiring additional time to complete the Pre-Trial Order.	
4	3. No trial date has been set.	
5	4. As a result, Plaintiff, Defendant, Ray Hearing Products, Inc. and Defendant, Hussmann	
6	Corporation respectfully request to have the Joint Pre-Trial Order due on October 31, 2018.	
7	Plaintiff, TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA and LAKE	
8	VALLEY PROPERTIES, LLC, Defendant, RAY HEARING PRODUCTS, INC. dba RHP	
9	MECHANICAL SYSTEMS and Defendant, HUSSMAN CORPORATION, respectfully request that	
10	the Court enter an Order granting its Joint Motion to Extend Time for Filing Joint Pre-Trial Order,	
11	and allow Parties to have until October 31, 2018 to file its Joint Pre-Trial Order.	
12	DATED this 24 th day of September, 2018.	
13	LAW OFFICES OF ROBERT A. STUTMAN, P.C.	
14		
15	<u>/s/ Kevin P. Smith</u> KEVIN P. SMITH, ESQ.	
16	500 Office Center Drive, Suite 301 Fort Washington, Pennsylvania 19034	
17	Attorneys for Plaintiff	
18		
19	CASTRONOVA LAW OFFICES, PC LINCOLN, GUSTAFSON & CERCOS, LLP	
20	<u>/s/ Stephen G. Castronova</u> /s/ James M. Barrington	
21	STEPHEN G. CASTRONOVA, ESQ. Nevada Bar No. 7305 THOMAS J. LINCOLN, ESQ. Nevada Bar No. 5699	
22	605 Forest Street Reno, Nevada 89509 JAMES M. BARRINGTON, ESQ. Nevada Bar No. 9252	
23	Attorneys for Defendant, 3960 Howard Hughes Parkway, RAY HEARING PRODUCTS, INC. Suite 200	
24	Dba RHP MECHANICAL SYSTEMS Las Vegas, Nevada 89169	
25	Attorneys for Defendant, HUSSMANN CORPORATION	
26	IT IS SO ORDERED.	
27	V/P-TPacificcheese_Krack/Atty Notes/Drafts/Pldgs/20180917_MOT_Joint Motion To Extend Time_Jmb,Docx	
28	Dated: September 24, 2018 U.S. District Judge	
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-3-

1	Pacific CheeseCo., Inc. v. Advanced Coil Technology, et al.		
2	U.S.D.C. No. 3:15-cv-00351-LRH-VPC		
3	CERTIFICATE OF SERVICE		
4	Pursuant to FRCP 5(b), I hereby certify that I am an employee of LINCOLN, GUSTAFSON		
5	& CERCOS, LLP, and that on this 24 th day of September, 2018, I did cause a true and correct cop		
6	of the foregoing JOINT MOTION TO EXTEND TIME FOR FILING JOINT PRE-TRIAL		
7	ORDER to be served via the CM/ECF filing system to all parties on the service list as follows:		
8	Kevin P. Smith, Esq.		
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25	jeannine.lee@stinson.com Deborah.hartung@stinson.com		
26	Stephen G. Castronova, Esq. CASTRONOVA LAW OFFICES, P.C.		
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28	Attorneys for Ray Heating products, Inc., dba RHP Mechanical Systems		

	Case 3:15-cv-00351-MMD-CBC Document 305 Filed 09/24/18 Page 5 of 5
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11	Rebecca A. Harrell, an employee
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